

Robert Yaquinto, Jr.
State Bar No. 22115750
SHERMAN & YAQUINTO, L.L.P.
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ATTORNEY FOR TRUSTEE

IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

IN RE:	§	
	§	
PREMISE MEDIA HOLDINGS, LP	§	CASE NO. 09-38751-BJH-7
	§	
DEBTOR	§	

**MOTION TO SELL PROPERTY OF ESTATE
FREE AND CLEAR OF LIENS AND ENCUMBRANCES**

TO THE HONORABLE BARBARA J. HOUSER, U.S. BANKRUPTCY JUDGE:

Robert Yaquinto, Jr., trustee, files this motion to sell the property of the estate and clear of liens and encumbrances with any liens and encumbrances to attach to the proceeds of sale and in support, respectfully shows the Court the following:

1. On December 29, 2009, **PREMISE MEDIA HOLDINGS, LP** ("Debtor"), filed its voluntary petition for bankruptcy under Chapter 7 of Title 11 of the United States Bankruptcy Code. Robert Yaquinto, Jr. was subsequently appointed Trustee of the bankruptcy estate.
2. This Court has jurisdiction over this matter pursuant to 11 U.S.C. §363. This is a core proceeding.
3. The assets of the estate include, but are not limited to, two cameras, an editing computer and a SteadyCam, all located at 17744 Preston Road, Suite 100, Dallas, TX 75252.

4. Trustee desires to sell the property of the estate at an online auction on Ebay to the highest bidder free and clear of liens and encumbrances with any liens or encumbrances to attach to the proceeds of the sale. The auction is to be held by Rosen Systems, Inc., with bidding to start on May 25, 2010 and end on June 1, 2010 at 10:00 a.m., at 17744 Preston Road, Suite 100, Dallas, TX 75252..

5. The Trustee believes the sale of the property is in the best interest of the estate.

WHEREFORE, Robert Yaquinto, Jr., trustee, seeks an Order from the Court authorizing the sale of the property of the estate at auction to the highest bidder free and clear of liens and encumbrances with any liens to attach to the proceeds of the sale; and for such other and further relief, both at law and in equity, to which the estate may be justly entitled.

ANY PARTY WISHING TO RESPOND TO THIS NOTICE MUST FILE THE RESPONSE WITH THE U.S. BANKRUPTCY CLERK, 1100 COMMERCE STREET, ROOM 12A24, DALLAS, TEXAS 75242, AND SERVE A COPY ON THE TRUSTEE AT 509 N. MONTCLAIR AVENUE, DALLAS, TEXAS 75208, WITHIN 12 DAYS OF THE SERVICE OF THIS NOTICE.

IF A RESPONSE IS FILED AND SERVED TIMELY, A HEARING WILL BE SCHEDULED WITH NOTICE TO THE RESPONDING PARTY ONLY. IF NO RESPONSE IS FILED AND TIMELY SERVED ON THE TRUSTEE, THE COURT MAY DEEM THIS NOTICE UNOPPOSED AND MAY ENTER AN ORDER GRANTING THE RELIEF REQUESTED WITHOUT FURTHER NOTICE TO ANY PARTY.

Respectfully submitted,

/s/ Robert Yaquinto, Jr.

Robert Yaquinto, Jr.

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ATTORNEY FOR TRUSTEE

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the *Motion to Sell Property of Estate Free and Clear of Liens, Encumbrances and Interests* has been forwarded by first-class mail, postage prepaid, to the United States Trustee, 1100 Commerce Street, Room 976, Dallas, TX 75242 and to those parties included on the attached Service List, on this 14th day of May, 2010.

/s/ Robert Yaquinto, Jr.
Robert Yaquinto, Jr.

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